

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
UNITED STATES OF AMERICA**

v.

ROBERT MENENDEZ, NADINE
MENENDEZ, WAEL HANA, JOSE URIBE,
and FRED DAIBES,

Defendants.

Case No. 1:23-cr-490 (SHS)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Declaration of Danny C. Onorato dated January 15, 2024¹, and the accompanying Memorandum of Law, defendant Nadine Menendez, through her undersigned attorneys, will and hereby does respectfully move this Court before the Honorable Sidney H. Stein, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order severing Ms. Menendez' trial from defendant Senator Menendez.

January 15, 2024

Respectfully Submitted,

/s/

David Schertler, Esq.
Danny Onorato, Esq.
Paola Pinto, Esq.
Schertler Onorato Mead & Sears
555 13th Street, NW, Suite 500 West
Washington, DC 20004
202-628-4199, Facsimile: 202-628-4177
dschertler@schertlerlaw.com
Counsel for Defendant Nadine Menendez

¹ The Declaration of Danny C. Onorato has been submitted *ex parte* and under seal because it reveals attorney work product and trial strategy in connection with Ms. Menendez's defense at trial.